

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

(1) DORIAN ROJAS and
(2) LENNON CARRASCO,

Defendants

) Criminal No. 20cr10316
)
) Violations:
)
) Count One: Possession with Intent to Distribute
) 100 Grams or More of Heroin
) (21 U.S.C. §§ 841(a)(1) and (b)(1)(B)(i))
)
) Count Two: Conspiracy to Distribute and to
) Possess with Intent to Distribute 400 Grams or
) More of Fentanyl, 100 Grams or More of
) Heroin, and 500 Grams or More of Cocaine
) (21 U.S.C. § 846)
)
) Forfeiture Allegation:
) (21 U.S.C. § 853)

INDICTMENT

COUNT ONE

Possession with Intent to Distribute
100 Grams or More of Heroin
(21 U.S.C. §§ 841(a)(1) and (b)(1)(B)(i))

The Grand Jury charges:

On or about August 6, 2019, in Cambridge, in the District of Massachusetts, the defendant,

(1) DORIAN ROJAS,

did knowingly and intentionally possess with intent to distribute 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(i).

COUNT TWO

Conspiracy to Distribute and to Possess with Intent to Distribute
400 Grams or More of Fentanyl, 100 Grams or More of Heroin,
and 500 Grams or More of Cocaine
(21 U.S.C. § 846)

The Grand Jury further charges:

From in or about November 2017 until on or about June 17, 2019, in Cambridge and Boston, in the District of Massachusetts, and elsewhere, the defendants,

(1) DORIAN ROJAS and
(2) LENNON CARRASCO,

conspired with each other and with other persons known and unknown to the Grand Jury, to knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, a mixture and substance containing a detectable amount of N-phenyl-N- [1- (2-phenylethyl) -4-piperidinyl] propanamide, also known as fentanyl, a Schedule II controlled substance, and a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

It is further alleged that the offense charged in Count Two involved 400 grams or more of a mixture and substance containing a detectable amount of N-phenyl-N- [1- (2-phenylethyl) -4-piperidinyl] propanamide, also known as fentanyl, a Schedule II controlled substance; 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance; and 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance. Accordingly, Title 21, United States Code, Sections 841(b)(1)(A)(vi), 841(b)(1)(B)(i), and 841(b)(1)(B)(ii) are applicable to this Count.

It is further alleged that, with respect to Count Two, 400 grams or more of a mixture and

substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide, also known as fentanyl, a Schedule II controlled substance, were reasonably foreseeable by, and are attributable to, defendants (1) DORIAN ROJAS and (2) LENNON CARRASCO. Accordingly, Title 21, United States Code, Section 841(b)(1)(A)(vi) is applicable to defendants (1) DORIAN ROJAS and (2) LENNON CARRASCO.

It is further alleged that, with respect to Count Two, 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, were reasonably foreseeable by, and are attributable to, defendant (1) DORIAN ROJAS. Accordingly, Title 21, United States Code, Section 841(b)(1)(B)(i) is applicable to defendant (1) DORIAN ROJAS.

It is further alleged that, with respect to Count Two, 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, were reasonably foreseeable by, and are attributable to, defendants (1) DORIAN ROJAS and (2) LENNON CARRASCO. Accordingly, Title 21, United States Code, Section 841(b)(1)(B)(ii) is applicable to defendants (1) DORIAN ROJAS and (2) LENNON CARRASCO.

All in violation of Title 21, United States Code, Section 846.

DRUG FORFEITURE ALLEGATION
(21 U.S.C. § 853)

1. Upon conviction of one or more of the offenses in violation of Title 21, United States Code, Section 841, and Title 21, United States Code, Section 846, set forth in Counts One and Two of this Indictment, the defendants,

(1) DORIAN ROJAS and
(2) LENNON CARRASCO,

shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such offenses; and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offenses.

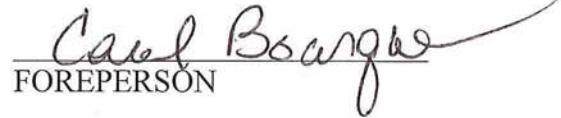
2. If any of the property described in Paragraph 1, above, as being forfeitable pursuant to Title 21, United States Code, Section 853, as a result of any act or omission of the defendants --

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property described in Paragraph 1 above.

All pursuant to Title 21, United States Code, Section 853.

A TRUE BILL


Carl Boarman
FOREPERSON


THEODORE B. HEINRICH
ASSISTANT UNITED STATES ATTORNEY
DISTRICT OF MASSACHUSETTS

District of Massachusetts: December 9, 2020
Returned into the District Court by the Grand Jurors and filed.

/s/ Dawn M. King 2:47pm
DEPUTY CLERK